Briefing Statement

Bureau: National Park Service
Issue: Notice of Availability for Final White-tailed Deer Management
Unit: Valley Forge National Historical Park
Date: August 5, 2009

Background: White-tailed deer population monitoring between 1986 and 2009 indicates an increase in deer density from 35 to 241 deer per square mile within Valley Forge National Historical Park. An increasing number of deer in the park over the past two decades has resulted in unacceptable changes in the species composition, structure, abundance, and distribution of native plant communities and associated wildlife. Additionally, browsing of tree seedlings and shrubs by deer in the park has prevented forest regeneration. In 2000, Congress directed the NPS to develop a plan to address the issue of deer management at Valley Forge NHP.

Work began on the White-tailed Deer Management Plan/EIS in 2006. Extensive public involvement, including a project web-site, brochure, four pubic meetings, and over 80 briefings to civic organizations, local elected officials and others, led to the development of four conceptual alternatives. These alternatives have been fully developed using the best available science and their impacts on the human environment evaluated.

All alternatives (including the no-action alternative) include response to chronic wasting disease (CWD). Response to chronic wasting disease (CWD) was integrated into each alternative to address the elevated risk of the disease in proximity to the park and because of the efficiencies and cost savings associated with incorporating CWD response into the deer management plan. Response to CWD was developed cooperatively with the Pennsylvania Game Commission and a full CWD Response Plan is provided as an appendix. A cooperative approach to CWD response was necessary due to the scale of the management area identified as necessary to address CWD (minimum 79 mi^2) relative to park size (5.3 mi^2).

Management Alternatives: A full range of reasonable alternatives were developed using the best available science and input from the public, and evaluated based on their ability to achieve the stated plan objectives and on their impacts to the human environment. Under all alternatives, the initial target deer density would be 31-35 deer per square mile (165-185 individuals park-wide). Deer density would be adjusted based on the success of forest regeneration (threshold of 8,000 tree seedlings per acre).

Alternative A, the no action alternative, would continue the existing deer management activities of monitoring deer population size and vegetation, small scale fencing of selected vegetation, removal of deer killed on roadways, public education, coordination with the Pennsylvania Game Commission, and continuation of limited CWD surveillance; no new deer management actions would be implemented.

CWD response is based on the proximity of a confirmed case of CWD to the park boundary and location of the park relative to a state-established CWD containment zone. Under Alternative A, while CWD is still more than 60 miles from the park boundary, deer would be tested opportunistically for the presence of CWD (opportunistic surveillance). Should a confirmed case of CWD be detected within 60 miles of the park boundary, then deer exhibiting clinical signs of CWD would be removed from the population and tested for disease (targeted surveillance). Should CWD be detected within five miles of the park boundary or if the park fell within a state-established CWD containment zone, then staff time would be dedicated to searching for deer exhibiting clinical signs of CWD and these animals would be removed from the population and tested (enhanced targeted surveillance).

Under this alternative, plant species diversity would continue to decline, the forest understory and associated wildlife habitat would continue to be degraded, and forest regeneration would not be expected

to occur. If CWD were introduced into the park, no actions would be taken to minimize the probability of occurrence or reduce the likelihood of spread of CWD. There would be few opportunities to work in partnership with state agencies on disease response.

Costs: Recurring annual costs for Alternative A would range from $14,828 to $32,567 depending on the proximity of CWD to the park boundary. Overall costs associated with the life of the plan (15 years) would range from $253,482 to $403,257.

Alternative B would combine several non-lethal actions including large-scale rotational fencing of 10% to 15% of the park's forested area and reproductive control of does to gradually reduce deer population in the park. Fencing would be rotated once adequate tree regeneration was observed.

Under Alternative B, actions described under Alternative A including those to address CWD would continue. In addition, should CWD be detected within five miles of the park boundary or if the park fell within a state-established CWD containment zone, then deer would be live tested via tonsillar biopsy and CWD-positive deer would be removed from the population. Live testing would occur during initial treatment of deer with a reproductive control agent.

Reproductive control would not reduce deer density significantly during the life of this plan. Therefore, plant species abundance and diversity would continue to decline in areas outside rotational fences. No forest regeneration would occur outside fencing, and once fencing was rotated these areas would again be exposed to heavy deer browsing and removal of the forest understory. If CWD were introduced into the park, there would be a high likelihood of disease spread within the park deer population and to deer populations surrounding the park. There would be few opportunities to work in partnership with the Pennsylvania Game Commission on disease response.

Costs: Recurring annual costs for Alternative B would range from $246,103 to $1,163,907 depending on the proximity of CWD to the park boundary. Overall costs associated with the life of the plan (15 years) would range from $8,056,657 to $14,025,682.

Alternative C would combine several lethal actions to address issues related to white-tailed deer. Under this alternative qualified federal employees or contractors would directly reduce the deer population in the park through sharpshooting and capture and euthanasia, where appropriate.

Under Alternative C, actions described under Alternative A including those to address CWD would continue. In addition, should CWD be detected within five miles of the park boundary or if the park fell within a state-established CWD containment zone, then active lethal surveillance would be initiated for the purposes of assessing disease presence, prevalence, and distribution. Active lethal surveillance would provide for a rapid reduction in the deer population to the initial target deer density and, if appropriate, a one-time reduction in the deer population to not fewer than 10 deer per square mile. A lower limit of 10 deer per square mile was selected to remain consistent with the range in deer density that will allow for forest regeneration (10-40 deer per square mile) provided in the scientific literature. These actions may also minimize the likelihood of CWD becoming established, minimize the likelihood of amplification and spread if the disease is introduced, and promote elimination of CWD, if possible.

A combination of lethal actions would result in achieving the initial target deer density within four years. Heavy browsing would be eliminated, allowing a diverse native plant community to develop. Forest regeneration would be restored, promoting re-establishment of the forest understory and perpetuation of existing forest cover. The likelihood of CWD becoming established and the likelihood of amplification and spread of CWD would be minimized. There would be many opportunities to partner and cost-share with the Pennsylvania Game Commission on disease response. As long as the closest confirmed case of CWD was more that 60 miles from the park boundary all meat would be donated to local food pantries.

Costs: Recurring annual costs for Alternative C would range from $56,113 to $176,817 depending on the proximity of CWD to the park boundary. Overall costs associated with the life of the plan (15 years) would range from $1,461,332 to $1,528,832.

Alternative D is the NPS Preferred Alternative. This alternative would combine lethal and non-lethal actions to address issues related to white-tailed deer. Under this alternative qualified federal employees or contractors would directly reduce the deer population in the park through sharpshooting as well as capture and euthanasia, where appropriate. Reproductive control of does would be implemented to maintain the deer population at the target deer density of 31-35 deer per square mile.

Under Alternative D, actions described under Alternative A would continue. Actions to address CWD would remain the same as described under Alternative C. If CWD were to be detected within five miles of the park boundary or the park fell within a state-established CWD containment zone AND reproductive control is being implemented then the park may return to lethal actions for a period of time for the purposes of disease response. As long as the closest confirmed case of CWD was more that 60 miles from the park boundary all meat would be donated to local food pantries.

Costs: Recurring annual costs for Alternative D during implementation of lethal actions would range from $112,363 to $176,817. Recurring annual costs for Alternative D during implementation of reproductive contol actions would range from $108,363 to $194,517. Overall costs associated with the life of the plan (15 years) would range from $2,036,082 to $2,925,282. Costs would vary depending on the proximity of CWD to the park boundary.

When approved, the plan will guide deer management actions over the next 15 years.

Status: During the public review period for the *Draft* White-tailed Deer Management Plan/EIS the NPS received 1,168 pieces of correspondence and 3,884 comments. NPS carefully reviewed all comments and prepared a Comment Response Report (contained in Appendix F of the final plan/EIS). Changes to the plan as a result of public comment consist of factual updates to baseline data and clarifications added to the text. Appendix E, Review of Wildlife Reproductive Control, was substantially updated to more accurately reflect the current state of the science. No changes were made to the preferred alternative or other alternatives evaluated, however.

The Final White-tailed Deer Management Plan/EIS is expected to be available in mid-August for public inspection during a 30-day no action period, which begins with publication of the EPA's Notice of Availability. After the 30-day no action period, a Record of Decision (ROD) will be prepared that will document approval of the plan, select the alternative to be implemented, and set forth any stipulations required for implementation. The ROD will be signed by the Northeast Regional Director, after which a Notice of Availability of the ROD will be published in the Federal Register. Publication of the Notice of Availability of the ROD will complete the NEPA/planning process, at which time the NPS will begin to implement the selected alternative. NPS expects the ROD to be signed by the end of September.

For Additional information:
http://www.nps.gov/vafo/parkmgmt/white-tailed-deer.htm

Congressional Districts:

Pennsylvania:	Jim Gerlach – 6th Congressional District
	Joe Sestak – 7th Congressional District
	Bob Casey – U.S. Senate
	Arlen Specter – U.S. Senate

Contact: Kristina Heister, Natural Resource Manager, Valley Forge National Historical Park, 610-783-0252 or kristina_heister@nps.gov